



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. **Z456 933 545**

AUG 01 2000

Mr. Cristopher Anderson
Director Environmental Affairs
L.E. Carpenter & Company
Suite 36-5000
200 Public Square
Cleveland, OH 44114-2304

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County
Hot Spot B and Hot Spot C Subsurface Lead Investigation Report

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed the responses to comments on the Hot Spot B and Hot Spot C Subsurface Lead Investigation Report dated May 15, 2000 and have the following comments:

Department's Comments

1. For guidance regarding the risk assessment that is proposed, "Recommendations of the Technical Review Workgroup for an Interim Approach to Assessing Risks Associated with Adult Exposure to Lead in Soil," USEPA, December 1996, should be used.
2. If the lead-contaminated soil is to remain on-site, the wells included in the quarterly sampling program must also be analyzed for both total and dissolved lead. Should this sampling indicate that ground water is impacted by lead, the Department may require additional delineation and remediation.

EPA's Comments

3. As EPA has previously stated, attempts to tie on-site lead to historical mining activities must be adequately supported. While L.E. Carpenter has previously stated that historical mining activities (or mining spoils) were located at the site, no concrete supporting data has ever been submitted. This data might include mining maps, old topographic maps, an old tax map, or other detailed reference or documentation which specifically locates a mine on the site. Merely stating that mining took place in

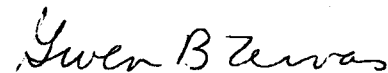
the general vicinity is not sufficient evidence upon which to alter the Record of Decision (ROD) remedy. In addition, as previously mentioned, the collection of comparison of background lead levels should be undertaken if the argument is to be made that the presence of lead is intrinsic to the area.

4. Regardless of the source of lead, high concentrations in the shallow soils present a hazard to human health and the environment that must be addressed. The full extent of contamination must be delineated. It is not clear why this effort was not completed as planned in the most recent round of field work. As EPA has previously stated, the full extent of contamination must be delineated, and calculations presented showing the amount of impacted soil above the 600 parts per million ROD action level that must be removed. If the extent of contamination is shown to be prohibitive, or related to background conditions, then an alternative can be considered. However, EPA does not believe that present data suggests that either of these are the case.

As discussed during our conference call on July 31, 2000, a work plan addressing the activities proposed on page 6 of RMT's May 15, 2000 letter will be submitted on August 30, 2000. A report documenting those activities will be submitted ninety (90) calendar days from the receipt of the Department's and EPA's approval of the work plan.

Please contact me at (609) 633-7261 if you have any questions.

Sincerely,



Gwen B. Zervas, P.E.
Case Manager
Bureau of Case Management

C: Stephen Cipot, EPA
Nicholas Clevett, RMT
George Blyskun, BGWPA
John Prendergast, BEERA